

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

1661, INC. d/b/a GOAT, a Delaware corporation,

Plaintiff,

v.

GOATLIFT, LLC, an Ohio limited liability company; and DOES 1-100,

Defendants.

Case No.: 2:24-cv-00078-MHW-KAJ

Judge: Hon. Michael H. Watson

**REQUEST FOR ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff 1661, Inc. d/b/a GOAT (“GOAT”) respectfully requests that the Clerk enter default in this matter against Defendant Goatlift, LLC (“Defendant”). Defendant has failed to appear, answer, or otherwise respond to GOAT’s Complaint.

1. GOAT filed its Complaint against Defendant on January 9, 2024. *See* Dkt. No. 2.  
2. On January 10, 2024, Defendant was served with the Summons and Complaint via its agent for service of process, United States Corporation Agents, Inc. *See* Dkt. No. 5.

3. Defendant’s response to the Complaint was due January 31, 2024. *See* Declaration of Kevin T. Shook in Support of Request for Entry of Default ¶ 4. Defendant failed to file a response by this deadline. *Id.*

4. To date, Defendant has not appeared, answered, or otherwise responded to the Complaint. *Id.* ¶ 5.

Accordingly, GOAT, respectfully requests that the Clerk enter Default against Defendant Goatlift, LLC.

Dated: February 5, 2024

/s/ Kevin T. Shook

Kevin T. Shook (0073718) (Trial Attorney)  
Samantha M. Quimby (0081968)  
FROST BROWN TODD LLP  
One Columbus, Suite 2300  
10 West Broad Street  
Columbus, Ohio 43215-3484  
Direct: (614) 559-7214  
Ph: (614) 464-1211  
Fax: (614) 464-1737  
kshook@fbtlaw.com

*Attorneys for Plaintiff*  
1661, INC. d/b/a GOAT

EN01519.Public-01519 4886-3372-6370v2  
2/5/2024

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

1661, INC. d/b/a GOAT, a Delaware corporation,

Plaintiff,

v.

GOATLIFT, LLC, an Ohio limited liability company; and DOES 1-100,

Defendants.

Case No.: 2:24-cv-00078-MHW-KAJ

Judge: Hon. Michael H. Watson

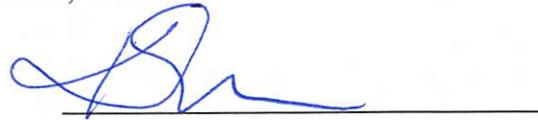
**DECLARATION OF KEVIN T. SHOOK IN SUPPORT  
OF REQUEST FOR ENTRY OF DEFAULT**

I, Kevin T. Shook, declare as follows:

1. I am a partner with the law firm of Frost Brown Todd LLP, counsel for Plaintiff 1661, Inc. d/b/a GOAT (“GOAT”) in this action. I am licensed to practice law in the State of Ohio and admitted before this Court.
2. GOAT filed its Complaint against Defendant Goatlift, LLC (“Defendant”) on January 9, 2024. *See* Dkt. No. 2.
3. On January 10, 2024, Defendant was served with the Summons and Complaint via its agent for service of process, United States Corporation Agents, Inc. *See* Dkt. No. 5.
4. Defendant’s response to the Complaint was due January 31, 2024. Defendant failed to file a response by this deadline.
5. To date, Defendant has not appeared, answered, or otherwise responded to the Complaint.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5<sup>th</sup> day of February, 2024 at Columbus, Ohio.



---

Kevin T. Shook

0155258.0777692 4871-1663-3762v1  
2/5/2024